

# **EXHIBIT 4**

## DRAFT

### **Settlement Reached with Bearings Manufacturers in Price Fixing Class Action Lawsuit**

DETROIT, MI – Freed Kanner London & Millen LLC; Kohn, Swift & Graf, P.C.; Spector Roseman & Kodroff, P.C.; Preti, Flaherty, Beliveau & Pachios, LLP; Cera LLP; and Cohen Milstein Sellers & Toll PLLC (“Settlement Class Counsel”) announce that the United States District Court for the Eastern District of Michigan, Southern Division (“Court”) has approved the following announcement of a proposed class action settlement with the JTEKT, Nachi, NSK, NTN, and SKF Defendants totaling \$37.5 million, and the proposed distribution of the proceeds of the settlement.

The lawsuit claims that Defendants conspired to suppress and eliminate competition for Bearings by agreeing to raise, fix, maintain, and/or stabilize prices, rig bids, and/or allocate markets and customers for Bearings sold to distributors in the United States, in violation of federal antitrust laws.

The settlement affects those distributors who purchased Bearings in the United States from January 1, 2000 through December 31, 2014 directly from any of the following entities (or their subsidiaries or affiliates): JTEKT Corporation; JTEKT North America Corporation (formerly Koyo Corporation of U.S.A.); Koyo France SA; Koyo Deutschland GmbH; Nachi-Fujikoshi Corp.; Nachi America Inc.; Nachi Technology, Inc.; Nachi Europe GmbH; NSK Ltd.; NSK Americas, Inc.; NSK Europe Ltd.; NSK Corporation; NTN Corporation; NTN USA Corporation; NTN Wälzlager GmbH; NTN-SNR Roulements; Schaeffler Group USA Inc.; Schaeffler Technologies AG & Co. KG (formerly Schaeffler Technologies GmbH & Co. KG); FAG Kugelfischer GmbH; AB SKF; SKF GmbH; and SKF USA Inc.

A hearing will be held on \_\_\_\_\_, 2021, at \_\_\_\_ .m., before the Honorable Sean F. Cox, United States District Judge, at the Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, Courtroom 817 (or such other courtroom as may be assigned for the hearing, or if the Court believes that it is appropriate, remotely by telephone or other electronic means), for the purpose of determining whether to approve: (1) the proposed settlement with the JTEKT, Nachi, NSK, NTN, and SKF Defendants; (2) the proposed plan of distribution of the settlement fund to members of the settlement class; and (3) Settlement Class Counsel’s requests for an award of attorneys’ fees, and reimbursement of litigation costs and expenses.

A Notice of Proposed Settlement (the “Notice”) was mailed to potential Settlement Class members on or about \_\_\_\_\_, 2021. The Notice describes in more detail the litigation and options available to Settlement Class members with respect to the settlement. The Notice and other important documents related to the settlement can be accessed at [www.AutoPartsAntitrustLitigation.com/Bearings](http://www.AutoPartsAntitrustLitigation.com/Bearings), or by calling 1-888-\_\_\_\_-\_\_\_\_ or writing to Bearings Direct Purchaser Antitrust Litigation, P.O. Box \_\_\_\_\_, Portland, OR \_\_\_\_-\_\_\_\_. Those who believe they may be a member of the Settlement Class, are urged to obtain a copy of the Notice.

SOURCE: United States District Court for the Eastern District of Michigan Southern Division

URL: [www.AutoPartsAntitrustLitigation.com/Bearings](http://www.AutoPartsAntitrustLitigation.com/Bearings)